

13 tenure, what was your goal for clearing a customer who had
14 reported a loss of dial tone in a situation other than a
15 nature disaster, major storm, that sort of thing?

16 A. What market segment is the customer a part of?

17 Q. Let's start off with residential customer.

18 A. Residential subscriber, the best performance
19 that we were able to achieve in the state during that time
20 period is roughly 14 hours on a rolling clock. The
21 typical average was about 24 to 36 hours, at that point in
22 time.

23 Q. And with the residential customers, did the time
24 differ, depending whether the call was received on a
25 weekend as opposed to during the weekday?

0018

1 A. It would certainly vary, based on the time the
2 report was received, even during the week, as well as the
3 geography that the customer may be calling from.

4 Q. Did you receive requests for customer service on
5 weekends?

6 A. Yes, we did.

7 Q. Did you receive requests for customer service
8 outside of normal business hours on the weekdays?

9 A. Let me clarify my answer. We received
10 maintenance requests for service on weekends, and we would
11 handle maintenance requests for customers outside of,
12 quote, normal, business hours.

13 Q. Can you explain to me the distinction you just
14 made, maintenance requests?

15 A. A maintenance request would be a customer who

16 already has service with Pacific Bell, and that service is
17 either not performing as they would expect it or has gone
18 completely out of service. A new service request or
19 general service request would be somebody who wants to
20 establish a new telephone number or alter their existing
21 services on an embedded telephone number.

22 Q. For someone who wanted to alter their existing
23 service, for example, would you handle such requests
24 outside of business hours?

25 A. The department that I had was not responsible
0019
1 for receiving those requests. We were responsible for
2 doing the physical work to provision them, and we would
3 sometimes work outside of normal business hours to handle
4 calls or volume, that was generated from the upstream
5 customer facing entity, during their normal business
6 hours.

7 Q. And how about work on weekends for such
8 customers requesting new service?

9 A. During times of heavy load, we would oftentimes
10 work overtime or weekends to achieve the load.

11 Q. Recognizing that you had different goals for
12 different types of customers and different classes of
13 services, can you generally describe for me the periods
14 within which you attempted to clear customer requests for
15 maintenance?

16 A. For the very top end of the business market
17 segment, our goal was to have those resolved within four

18 hours. For the low end of the business segment, it was,
19 generally, the goal was eight hours, and I have already
20 mentioned where we were on the residential subscribers.

21 Q. Were there goals in connection with
22 nonmaintenance requests, requests for new service, or
23 changes in service?

24 A. I wouldn't say that there were goals,
25 specifically. Again, we monitored the length of time that
0020
1 it took to achieve those, and it would vary by time of
2 year. For example, during the winter months, the duration
3 for a new service request may extend out as far as five
4 days. During our summer months where maintenance volumes
5 are not as high, it could have been as short as one day.

6 Q. What position did you hold prior to becoming
7 regional manager in June of '91?

8 A. In the two-year period prior to June of '91, I
9 was on a leave of absence, finishing my graduate degree.

10 Q. Did you receive a degree?

11 A. Yes, I did.

12 Q. What was your degree?

13 A. Master's in business administration and
14 information systems and marketing.

15 Q. From where did you receive that?

16 A. University of California, Los Angeles.

17 Q. That work would have covered the period, roughly
18 June of '89 through June of '91?

19 A. It would have covered the period September of
20 '89 through May of '91.

21 Q. The work at UCLA on your MBA, what was your
22 prior position?

23 A. I was responsible for customer service, strategy
24 development and project management in the residence and
25 small business market segments.

0021

1 Q. Did you have a job title?

2 A. Yes, I did.

3 Q. Is it short?

4 A. If you will accept the acronym.

5 Q. What was your job title?

6 A. Project manager, ICSE.

7 Q. ICSE?

8 A. Ideal Customer Service Environment.

9 Q. When did you start in that position?

10 A. Let's see. I believe I started in that position

11 in approximately May of 1988.

12 Q. Can you describe for me your job

13 responsibilities as project manager ICSE?

14 A. I was responsible for developing the overall

15 strategy for our consumer and small business market

16 segment as to how we wanted to serve the customers, and

17 implementing projects to include -- what would be included

18 in that would be technology projects such as deployment

19 of -- deployment of statewide automatic call distribution

20 technology, automated outbound dial, automated response

21 units such as voice response units, setting standards

22 around business office hours of operation, collection

23 standards for how we were going to collect monies from
24 customers in a wide variety of service initiatives,
25 basically.

0022

1 Q. To whom did you report in that position?

2 A. I reported to a lady by the name of a Elisa
3 Kinder, E-l-i-s-a, K-i-n-d-e-r, who was the executive
4 director of business office technology management.

5 Q. Did you have individuals reporting to you in
6 that position?

7 A. Yes, I did.

8 Q. Who were they, just by number and job titles? I
9 am not asking for a list of names. I just want --

10 A. I can't remember precisely, but I would guess
11 that my direct reports at that time were about six
12 individuals.

13 Q. And what were their job functions?

14 A. They were project managers who were responsible
15 for deploying technology in various geographies of the
16 state, or responsible for the oversight of implementation
17 of a particular piece of technology.

18 Q. In terms of territory, were your job
19 responsibilities statewide?

20 A. Yes, they were.

21 Q. Prior to May of '88, what was your position?

22 A. I was the area manager for the residential
23 business offices in the central coast region.

24 Q. Can you describe what the central coast region
25 is?

east on is the area south of
outh of San Luis Obispo, and inland
mountain range is that separates
the coast, Tehachapi's, I am not

were you in that position?

ted in that position early in
mber the exact month.

e describe for me your job

it role?

customer service functions that
handling any telephone customer
service requests, change of customer
istor - billing inquiries for the
gment.

handled it. You were the area
managing the people who were taking

business offices that were
those calls.

you report?

uben Garcia.

Mr. Garcia's position?

gional manager for the -- what was
sidential Service Organization,
ory of mine plus the central coast

6 one, where we had internal standards that we had
7 established, and I was responsible for managing those
8 internal standards.

9 Q. And here, you were dealing just with residential
10 customers; is that right?

11 A. That is correct.

12 Q. And during that time period, what was your
13 standard for responding to a customer request, for
14 example, for a correction of a loss in dial tone?

15 A. The particular organization that I had
16 responsibility for would not be handling maintenance-type
17 requests.

18 Q. What type of requests was your organization
19 handling?

20 A. New service requests, change of service
21 requests, or inquiries about their bill, or collection
22 activity on their bill.

23 Q. So what were the standards for response to a
24 request for new service?

25 A. The standards would be no different than what I
0026 described previously for the provisioning activities. We
2 basically provided due dates or intervals that were
3 consistent with our operations field counterparts that
4 were able to handle that. Those standards varied, from
5 time of year, particular geography, it could vary anywhere
6 from two to five days.

7 Q. Did your work force work seven days a week at

8 that time? Was it just normal business hours weekdays?

9 A. At that time, it was Monday through Friday.

10 Q. And what were your standards for responding to a
11 customer request for change in service?

12 A. It would depend on the type of service change
13 the customer was requesting.

14 Q. What were some of the different types that
15 customers requested?

16 A. A vertical feature change, such as adding
17 something like call waiting, call forwarding. At that
18 point in time, that interval was about two days. A
19 listing change depended on the type of change they wanted.

20 Could be as long as 10 days to take effect. A records
21 change, such as changing the billing address on a
22 particular customer's account, could be handled in a day.

23 Q. Would your operation also handle a request from
24 a customer for correction in a listing change, for
25 example, if a customer was dropped from the directory?
0027

1 A. We would be responsible for handling the
2 customer request to resolve that issue and would work with
3 other departments to resolve.

4 Q. Different standard for dealing with such a
5 request?

6 A. A discrepancy such as that would generally not
7 have a standard, per se.

8 Q. The idea would be just to correct on an ASAP
9 basis?

10 A. It would be to correct it as quickly as

11 possible, based on -- the complexity of the correction

12 would determine how long it would take.

13 Q. Prior to your position as area manager, what was
14 your position?

15 A. I was the area manager in San Diego for

16 collections.

17 Q. During what time did you serve in that role?

18 A. I will let you do the math on it, but it was

19 about a six-month assignment at that point in time.

20 Q. When did you begin your employment with Pacific
21 Bell or any Pacific Bell affiliate?

22 A. 1985, September 3rd.

23 Q. Did you have any involvement in the customer
24 service functions prior to your work in the area -- work
25 as area manager at the residential business office,
0028
1 central coast region?

2 A. Yes.

3 Q. Let's just continue to go backwards here. Prior
4 to your six-month stint as the area manager for
5 collections, what was your prior position?

6 A. Business office supervisor at a business office
7 in Pasadena.

8 Q. During what time period did you serve in that
9 role?

10 A. Pretty much from the hiring into the company
11 until the time I went down to San Diego.

12 Q. So that would be from '85 until --

6 \ at UCLA. Could you describe for me your course of
7 study there?

8 A. Master's of business administration, which would
9 include typical Master's business curriculum. I majored
0 in systems management and marketing. Would you like me to
1 be more specific?

2 Q. Not having studied information systems, could
3 you describe for me what is entailed in such a course of
4 study?

5 A. It would be generally understanding the
330 investment portfolio and decision making around investment
: decisions. And information technology, studying the
: effects of deployment of information technology on
: w place and work force, studying specific technologies
: that are used for information processing in the state of
: industry, studying the development of software
: applications for purposes of business function and
: information technology environment

Q. Let's go back to January of '97 when you became
0 the vice president for resale operations; is that the
1 correct title?

2 A. That's correct.

3 Q. What are your job responsibilities in that role?

4 A. I have responsibility for the methods and
5 procedures associated with retail -- sorry, resale
5 products and services, the order processing functions
7 associated with resale services, and the maintenance

21 A. Pacific Bell has one Local Interconnection
22 Service Center that has multiple locations in the state.

23 Q. You indicated that you had read Mr. Sinn's
24 deposition. In that did you note his discussion of there
25 being two LISC's?
0032

1 A. I don't recall specifically noting that, I don't
2 think. His answer is probably inconsistent with mine. We
3 have a LISC that has multiple locations in the state.

4 Q. Is there one LISC that is -- are there any of
5 the locations that fall outside of your area of
6 responsibility?

7 A. No.

8 Q. Would it be the same -- when you started in
9 January of '97 --

10 A. Can I maybe clarify? I think, in Mr. Sinn's
11 deposition, he was addressing the facilities LISC and a
12 resale LISC as possibly being the two LISC's, that you are
13 referring to.

14 Q. I believe that's correct.

15 A. In your previous question, you asked me if I had
16 responsibility for the resale functions, of which I said
17 yes, I did. I do not have responsibility for the
18 facilities or unbundled functions.

19 Q. Okay. So there is a separate Local Information
20 Service Center for unbundled functions and that is outside
21 of your responsibility; is that correct?

22 A. Interconnection Service Center, and yes, it is

23 outside my area of responsibility.

24 Q. Mr. Sinn maintains responsibility for that?

25 A. Yes, he does.

0033

1 Q. I will try to use the phrase resale LISC so that

2 we know which one we are talking about. If I omit that --

3 if I am talking about the LISC, unless I make it clear to

4 the contrary, I am talking about the resale LISC.

5 Could you just describe what -- first of all,

6 you said there are multiple locations. Where are the

7 various locations for the resale LISC?

8 A. Currently, the resale LISC has locations at 370

9 3rd Street in San Francisco, 1472 Edinger in Tustin, 2700

10 Watt Avenue in Sacramento.

11 Q. Are those the three locations?

12 A. Yes.

13 Q. Can you describe for me, in general terms, what

14 you do in a normal week, what your job duties entail?

15 A. Answering a lot of letters from various CLC's,

16 speaking with a lot of customers around their

17 dissatisfaction with service levels, working with members

18 of my team to determine how we can improve the efficiency

19 of our operation, working with the systems technology

20 community to plan and implement systems releases to

21 support my operation, working with members of the legal

22 and regulatory departments on various proceedings and

23 filings that occur that the LISC and other parts of my

24 organization are responsible for, that's a general sense

25 of what I would do in a week.

0034

1 Q. I want to get a sense of how this is organized
2 from a structural standpoint. To whom do you report?

3 A. Liz Fetter, president of industry markets group.

4 Q. And who reports to you?

5 A. I have the director of the LISC, Don Griffin,
6 who reports to me. I have the director of the
7 information -- Interconnection Service Center who reports
8 to me, which would be Sam Tenerelli; the director of
9 methods and procedures for resale operations that reports
10 to me, which would be Leslie Wood, and then I have a human
11 resources manager, who reports to me, by the name of
12 Harriet Derosset, and a staff manager who reports to me by
13 the name of Joy Norton, N-o-r-t-o-n.

14 Q. The second name you gave was Sam somebody?

15 A. T-e-n-e-r-e-l-l-i.

16 Q. Could you describe in general terms what
17 Mr. Griffin's job responsibilities are?

18 A. Mr. Griffin is responsible for the daily
19 operation of the Local Intersection Service Center.

20 Q. What are Mr. Tenerelli's job responsibilities?

21 A. Primarily responsible for the daily operation of
22 the Interconnection Service Center, which is the
23 maintenance side of the organization.

24 Q. Can you describe for me what Ms. Woods' job
25 responsibilities are?

0035

1 A. She has responsibility for development of
2 methods and procedures and systems user requirements for

3 resale.

4 Q. Could you describe for me what Harriet's
5 requirements are?

6 A. D-e-r-o-s-s-e-t. Harriet is responsible for
7 human resources, such as hiring, recruiting and training
8 of new employees.

9 Q. Can you describe Joy Norton's responsibilities,
10 please?

11 A. Joy just started working for me this week, and
12 her responsibility is managing my administrative
13 functions, such as the organization budget, our overall
14 results, handling customer escalations and special project
15 management.

16 Q. What do you mean by customer escalations?

17 A. Those would be calls or letters that I receive
18 that require additional research or investigation to
19 determine the disposition of the issue.

20 Q. Is she serving, basically, a troubleshooter
21 function in that sense?

22 A. She does leg work for me on the stuff that I
23 don't have the time or wherewithal to follow up on
24 consistently.

25 Q. When did Ms. Derosset start working with the
0036
1 LISC?

2 A. She doesn't work with the LISC, per se, she
3 works for my organization which supports the LISC. She
4 began work about two weeks after I arrived, so February of
5 this year.

6 Q. What would you call your organization?

7 A. My organization is called resale operations.

8 Q. When did Ms. Woods commence working for resale
9 operations?

10 A. When I arrived, this organization was formed at
11 that point in time, and she was doing her present capacity
12 someplace else in the organization but moved over to work
13 for me.

14 Q. She was working in connection with the LISC
15 prior to your arrival, and then there was reorganization
16 upon your arrival?

17 A. That's my understanding.

18 Q. When did Mr. Tenerelli commence working in
19 connection with the LISC?

20 A. I don't know. I can -- again, he reported to me
21 when I arrived here, but I don't know what his situation
22 was before that.

23 Q. How about Mr. Griffin?

24 A. Same answer.

25 Q. What was the first contact you had with anyone
0037
1 at Pacific concerning taking over responsibility for
2 resale operations?

3 A. In late December, just prior to the Christmas
4 holiday, I had a phone conversation with Ms. Fetter about
5 the possibility of my reassignment.

6 Q. What did she tell you at that time about the
7 LISC?

8 A. That we were in need of greater degree of
9 operational focus, that the business was growing rapidly
10 and we needed to augment the leadership, to put the right
11 degree of effort and energy behind it to get it running
12 properly.

13 Q. Can you explain for me --

14 Let me hear the last answer back, please, I'm
15 sorry.

16 (Record read.)

17 MR. PUDDY: Q. We had a short break. In your
18 prior answer, you made reference to the right degree of
19 effort. What was the right degree of effort for the LISC?

20 MR. KOLTO-WININGER: I will object. Lacks
21 foundation; calls for speculation. But go ahead and give
22 your best answer.

23 THE WITNESS: I am not really sure exactly what
24 Liz in her -- what Liz had in her mind. I guess we needed
25 to improve things or find a way to put more discipline or
0038

1 a better operational approach, and somebody will say, We
2 need to put focus on it, so I am referring to that's what
3 she was driving at.

4 MR. PUDDY: Q. It's your understanding that as
5 of 1996, January, Liz Fetter was saying that there was
6 insufficient effort at the LISC?

7 A. I don't think that's it. I think she was
8 indicating we needed to put more effort behind it.

9 Q. How was that call initiated? Did she call you
10 or you called her?

11 A. She called me.

12 Q. And could you relate for me, as completely as
13 you can -- withdraw that.

14 How long did the conversation last?

15 A. That particular conversation, oh, 15 minutes.

16 Q. Was this a call during business hours to you at
17 work?

18 A. Yes, actually, it was a workday. I think I had
19 a half a day off and I talked to her in that half a day
20 off.

21 Q. Could you please relate for me, as fully as you
22 can, what was said between the two of you during that
23 conversation?

24 A. She described the organization changes that they
25 wanted to make to consolidate the resale operations under
0039

1 one entity, to provide the kind of focus that the market
2 segment deserved. She indicated that the growth in the
3 segment was going to be very large, and they needed to
4 break it out as a separate line of business, to give it
5 the kind of focus and attention needed to be successful.

6 She indicated that there was a need to put
7 additional resource, from a plan and operations
8 perspective, into that work group to ultimately make it
9 successful. That my name had come up as a potential
10 candidate to do that because of my background in multiple
11 functions and disciplines.

12 That there was a need to do some process

16 spoke with Liz, around a similar vein of discussion that
17 Liz had had with me.

18 MR. PUDDY: Q. So did Mr. Harden have any
19 involvement with the LISC at that time?

20 A. No.

21 Q. Was the nature of the discussion, generally,
22 should you or shouldn't you go, or could you, could you
23 not go?

24 A. It was that, and a discussion that the
25 corporation was in need of really putting a substantial
0041
1 degree of focus behind it, and we are looking to all there
2 is in business to continue to move resources to improve
3 the operation. And he was trying to encourage me that it
4 was probably the right thing for me to do, despite the
5 penalties we'd pay in my current operation for moving on.

6 Q. What penalties are those?

7 A. I was in the middle of a major deployment in my
8 current operation, and we were just finishing up the final
9 phases of integration testing on major -- moving out of a
10 trial mode into mass deployment and taking the products
11 commercial. And I was basically moved out of that right
12 at that point in time, which put Tim in a difficult
13 position.

14 Q. When was the conversation with Tim Harden?

15 A. When was the conversation with Tim Harden?

16 Within 24 hours of the conversation I had with Ms. Fetter.

17 Q. That would be late December of '96?

1. Uhm-hum.

2. Was that a face-to-face meeting?

1. The initial conversation took place over the phone.

2. What was the next communication you had with me about taking over as vice president of resale operations?

1. I believe Ms. Fetter and I had another session after that, after my conversation with Harden, discussing the results from my discussion with Harden.

2. Was that a face-to-face conversation or --

1. It was over the telephone.

2. Was that also in late December of '96?

1. Y

2. What did you and Ms. Fetter discuss in that conversation?

1. We got a little bit more specific around whether it I'd accept the position and did it make sense to me, and I believe, in that conversation, I told her move ahead.

2. In the course of that conversation, did you have discussion about any specific ongoing problems at the time?

1. Other than the operational challenges that I mentioned in kind of the gross general terms, no.

2. What did you discuss, in general terms, about operational challenges?

23 every discussion you had with Mr. Kolto-Wininger.

24 MR. KOLTO-WININGER: Objection. Instruct not to
25 answer.

0044

1 MR. PUDDY: There you go. There is a good
2 objection.

3 MR. KOLTO-WININGER: There's three good ones
4 now.

5 MR. PUDDY: Q. A little more serious now, what
6 was the next communication you had with anyone, after that
7 second conversation with Ms. Fetter, that related to you
8 taking over as resale manager.

9 A. Sometime in early January, Ms. Fetter's human
10 resources director called me to work out details around
11 date of arrival, salary issues, things like that.

12 Q. What was the next conversation that you had with
13 anyone -- of substance of the LISC, which is to say, other
14 than getting you in place, moving your chair over, and so
15 forth?

16 A. I would say the first day I showed up on the
17 job, which is roughly, January 16th, I believe, I sat
18 through a planning meeting that was reviewing
19 documentation relative to -- kind of all over LISC
20 operations, and in that session, it was used as an
21 opportunity to learn and ask questions about how orders
22 were processed, et cetera.

23 Q. So on or about the 16th, there was a meeting.
24 Who was in attendance?

25 A. At that first meeting?

5

Q. Right.

A. Jeff Phelps, Chris Vivaros, Martha Auld, Leslie Wood, Shery Gonda, Peggy Garber, and I believe that's all remember at this point.

MR. KOLTO-WININGER: I need a second here.

(Discussion between counsel and witness.)

MR. PUDDY: Q. How long did that meeting last?

A. Let's see, I remember going to the bathroom in the middle of it, so it probably was at least three to four hours.

Q. In the course of that meeting, were you advised of any problems that had been encountered concerning personnel of the LISC?

A. That was probably the first time I was exposed to an issue that we were not necessarily processing all the orders relative to the commitments that had been made.

Q. Who was running the meeting?

A. Martha Auld was the person who was really responsible for coordinating the information in that meeting.

Q. Were there minutes to the meeting?

A. Not that I am aware of.

Q. Did anyone take notes at the meeting?

MR. KOLTO-WININGER: That you are aware of.

THE WITNESS: I am not -- I don't know.

MR. PUDDY: Q. Did you take notes at the

try to discuss the acronym, so --

MR. ETTINGER: So you were using FOC's?

THE WITNESS: Yes.

MR. KOLTO-WININGER: As Mr. Ettinger probably

advised you, while we are addressing the foundational

questions like -- that Peggy Garber is an attorney, and my

understanding, having talked to the witnesses, that she

was not there for the purposes of rendering legal advice,

I won't invoke any privilege except as to maybe

comments made by her, but otherwise, comments made during

the meeting, we will allow discovery on.

MR. PUDDY: Q. You indicated that Firm Order
confirmations hadn't been issued within 24 hours in some
instances. Were you advised of the time period during which
Firm Order Confirmations had been outstanding? In other
words, had they been outstanding for hours longer, days,
weeks?

A. I don't remember specifically the duration, but
I remember it to be within the range of days.

Q. Other than delays in issuing -- the acronym
generally used for that document is FOC, correct?

A. Uhm-hum, yes, that's correct.

Q. And other than delays in the issuance of FOC's,
were you advised of any other problems at that meeting?

A. No, I wasn't advised of other problems. The
major focus of the meeting was kind of educational for me,
to just continue how business works, so to speak, what

11 at that time that Pacific was using basically three
12 different classes of people to perform the work, full-time
13 employees, contract employees, and people borrowed from
14 other departments. Does that comport with your
15 understanding?

16 A. That's correct.

17 Q. As you sit here, you don't know how many
18 full-time employees there were?

19 A. I cannot quote you an exact number, no.

20 Q. Do you have an estimate?

21 A. It's difficult for me to pinpoint on January
22 16th, because we were in the middle of a hiring blitz in
23 Northern California at that point in time, so I don't know
24 exactly how many were on the payroll the day I came in
25 versus within weeks after I came in.

0050

1 Q. And you say you were on a hiring blitz; were you
2 hiring full-time employees or contract employees?

3 A. Full-time employees.

4 Q. And as of the date you started, how many
5 contract employees were there in the LISC?

6 A. I don't know.

7 Q. And as of the date of your hire, how many people
8 were involved performing LISC functions as Pacific Bell
9 employees borrowed from other departments?

10 A. I don't know how many exactly on that particular
11 day, but given my understanding of the process in the
12 subsequent days, it could change on a given day from

discussion at that meeting
such as facilitating staffing
the LISC employees as opposed to
fellow employees?

discussion concerning goals for

these discussions?

discussion of where the current
you know, service representatives
union, contract employees, and we
was not within the context of
going forward.

When with Ms. Fetter, you had
needed to increase throughput
come up in your meeting on or

the context of we talked
per day or completions per day that
point in time.

you handling at that time?

precisely. I recall it to be
about 600, best of my recollection.

What the goal for throughput

LISC at that time?

stated goal in terms of raw

21 Q. So somewhere around the 23rd of January that you
22 were supposed to increase productivity by a factor of five
23 within a week, what steps did you take to achieve that?

24 My math is bad. At any rate, you were getting
25 about 600 orders per day, but a week after you arrived,
0054
1 which would make it about the 23rd, you were told you were
2 supposed to achieve 4000 a day by the end of January. How
3 did you set out to achieve that?

4 A. I can't say that I necessarily spent all my
5 waking time and hours trying to figure out exactly how to
6 get to 4000, as much as trying to assess what the overall
7 situation was within the LISC, and understanding what the
8 factors of capacity were and what drove throughput. But I
9 don't believe I was doing that discovery within the terms
10 of, is it 4000, 8000 or 2000. It was the process overall.

11 Q. Who advised you of the 4000 orders per day
12 bogee?

13 A. I think Jerry Sinn probably mentioned it. It
14 was the first person that mentioned it to me.

15 Q. For the record, he previously had responsibility
16 for overall operations of the LISC?

17 A. That's correct.

18 Q. And based on what you knew in January 1997, what
19 changes did you have to make in order to achieve 4000
20 orders per day?

21 A. Based on what I knew in January of 1997, I don't
22 know what the changes were to achieve that.